

# SOUTHERN ENVIRONMENTAL LAW CENTER

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May 31, 2018

*Via Email*

Jocelyn Boyd, Chief Clerk / Administrator  
Public Service Commission of South Carolina  
101 Executive Center Drive, Suite 100  
Columbia, SC 29210

**Re: Motion to Compel Discovery Responses and Production by SCE&G and  
Dominion (Expedited Review Requested)  
Consolidated Docket Nos.: 2017-207-E, 2017-305-E, 2017-370-E**

Dear Ms. Boyd:

Intervenors South Carolina Coastal Conservation League (“CCL”) and Southern Alliance for Clean Energy (“SACE”) support the South Carolina Office of Regulatory Staff’s Motion to Compel Discovery Responses and Production filed on May 23, 2018.

CCL and SACE concur with the arguments advanced by the Office of Regulatory Staff (“ORS”) in support of its motion. The discovery requests propounded by ORS easily meet the requirements of South Carolina law. They bear directly on the issues of the prudence and timing of abandonment of the V.C. Summer nuclear project and likely will lead to other matters relevant to the important issues in this proceeding. *See In Re: State Universal Service Support of Basic Local Service Included in a Bundled Service Offering or Contract Offering*, Docket No. 2009-326-C, Hearing Officer Directive Oct. 7, 2009 at p. 3 (scope of discovery “encompass[es] any matter that bears on, or that reasonably could lead to other matters that could bear on, any issue that is or may be in the case. . . .”) (quoting *Oppenheimer Fund, Inc. v. Sanders*, 437 U.S. 340, 351 (1978)).

This combined docket presents novel and significant issues for South Carolina—issues that will decide both the electricity provider and cost of electric service for SCE&G ratepayers—and expedited review of ORS’ motion is necessary to ensure that the parties and, perhaps most importantly, the Commission have the opportunity to review all information needed to properly consider this case.

The process of discovery is, ultimately, a process of seeking the truth. Thus far, South Carolina Electric & Gas Company and Dominion Energy, Inc. (the “Joint Applicants”) have obstructed the attempts by ORS and other parties to obtain the truth through discovery in these dockets. Left unchecked, the Joint Applicants’ obstructionist approach will impede the parties’ ability to present their case and deprive this Commission of the facts necessary to render informed decisions. This should be unacceptable to the Commission. We respectfully request that the Commission grant ORS’s motion as expeditiously as possible.

Sincerely,

A handwritten signature in blue ink, appearing to read "William C. Cleveland".

William Cleveland  
Blair Holman  
Elizabeth Jones

cc: David Butler, Hearing Officer (via email)  
Parties of record in 2017-207-E, 2017-305-E, and 2017-370-E (via email)